

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

|                            |   |                                |
|----------------------------|---|--------------------------------|
| JOHN WILLIAMS,             | : |                                |
|                            | : | Civil Action No. 2:22-cv-00394 |
| Plaintiff,                 | : |                                |
|                            | : |                                |
| v.                         | : |                                |
|                            | : |                                |
| PENNSYLVANIA DEPARTMENT OF | : |                                |
| CORRECTIONS and QUEHANNA,  | : |                                |
|                            | : |                                |
| Defendants.                | : |                                |

**DEFENDANTS' DESIGNATION OF DISCOVERY EXCERPTS**

Pursuant to the Court's January 19, 2022 Pretrial Order (ECF 98), Defendants Pennsylvania Department of Corrections and Quehanna, (collectively "Corrections Defendants") by and through their undersigned counsel, designated the following discovery excerpts to be offered at trial:

It is anticipated that all parties who have been deposed will be available to testify at trial; accordingly, the Corrections Defendants reserve the right to use their respective deposition testimony for impeachment and rebuttal evidence as appropriate.

WHEREFORE, the Corrections Defendants respectfully request that the Court accept the foregoing as the Corrections Defendants' Designation of Discovery Excerpts in this case.

Respectfully submitted,

JOSH SHAPIRO  
Attorney General

s/ Sarah J. Simkin

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Date: April 15, 2022

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| CORRECTIONS and QUEHANNA,  | : |                                |
|                            | : |                                |
| Defendants.                | : |                                |

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the within *Corrections Defendant's Designation of Discovery Excerpts was* served upon all parties of record via ECF.

/s/ Sarah J. Simkin  
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April 15, 2022